

## REMARKS

Applicant requests favorable reconsideration and allowance of this application in view of the foregoing amendments and the following remarks.

Claims 1, 3, 5-17, 19, and 21-23 are pending in this application, with Claims 1, 17, 19, and 22 being independent.

Claims 1, 17, 19, and 22 have been amended. Applicant submits that support for the amendments can be found in the original disclosure, and therefore no new matter has been added.

Claims 1, 3, 5-11, 16, 17, 19 and 21-23 were rejected under 35 U.S. C. 103(a) as being unpatentable over U.S. Patent No. 6,785,814 to Usami et al. in view of U.S. Patent No. 7,069,584 to Davis. Claims 12-15 were rejected under 35 U.S.C. 103(a) as being unpatentable over Usami et al. and Davis in view of U.S. Patent Publication No. 2001/0013097 to Ito et al. Applicant respectfully traverses these rejections for the reasons discussed below.

As recited in independent Claim 1, the present invention includes, *inter alia*, the features of adding means for repeatedly adding additional information to image data to generated information-added data and encrypting means for encrypting the information-added data to make it difficult to detect a position where the additional information is added, wherein the encrypting means encrypts the information-added data by randomly arranging the additional information as well as the image data. Applicant submits that the cited art fails to disclose or suggest at least these features of Claim 1.

Usami discloses an image process apparatus in which division means 22 divides an image represented by original image data S0 into areas that each include a

plurality of blocks, so as to obtain image data  $S_n$  for each area. Supplementary information generating means 23 generates information regarding photographing as supplementary information  $H$ , and optimization means 24 obtains supplementary information  $H_n$  for each area by optimizing the supplementary information  $H$  for each area divided by division means 22. Embedding means 25 then embeds the supplementary information  $H_n$  for each area in the image data  $S_n$  for the corresponding area using deep layer encryption, thereby producing image data  $S_1$  embedded with the supplementary information  $H$ . See col. 12, line 17 through col. 13, line 12.

Hence, Usami discloses that the supplementary information  $H_n$  is encrypted and that the encrypted supplementary information is added to the image data  $S_n$ . However, as the Examiner correctly recognizes, that patent does not disclose or suggest at least the feature of encrypting the information-added data. To remedy this deficiency, the Examiner cites Davis. Applicant submits, however, that Davis also fails to disclose or suggest encrypting the information-added data. In particular, Applicant submits that Davis fails to disclose or suggest encrypting the information-added data by randomly arranging the additional information as well as the image data.

Davis discloses that a “Super PIN” is generated using a Secret Identifier and Random Data, and the Super PIN is then added to a Chit. See, e.g., Fig. 2. In particular, the Super PIN is generated by encrypting the Secret Identifier using the Random Data. However, Davis does not disclose or suggest encrypting the Chit after the Super PIN is added to it.

Thus, Applicant submits that Davis, like Usami, merely discloses encrypting the additional information and then adding it to other data. In the case of Usami, the

supplementary information is encrypted and then added to the image data Sn, and in the case of Davis, the Secret Identifier is encrypted using the Random Data to generate the Super PIN, which is then added to the Chit. In neither case is the information-added data encrypted by randomly arranging the additional information as well as the image data. For this reason, even if combined, the cited art fails to disclose the invention recited in Claim 1.

The other independent claims recite features similar to those of Claim 1 discussed above, and those claims are patentable for reasons similar to Claim 1.

The dependent claims are patentable for at least the same reasons as the independent claims, as well as for the additional features they recite.

In view of the foregoing, Applicant submits that the present invention is in condition for allowance. Favorable reconsideration, withdrawal of the outstanding rejections, and an early Notice of Allowance are requested.

Applicant's undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,



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